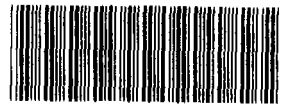




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GENERAL SERVICES ADMINISTRATION

8267

MEMORANDUM

TO: Jeremy Karparkin
Joe Legare — 5918
Alan Parker, Kaiser Hill
Jack Hoopes, Kaiser Hill

FROM: Tim Rehder, U.S. Environmental Protection Agency

SUBJECT: Collective Significance Report for T3/T4

On May 28, 1997, when I met with Keith Klein, Bob Tiller, Jeremy Karparkin, Joe Legare, and Mark Spears in preparation for the public meeting sponsored by Leroy Moore I was promised by all in attendance that written response from the site to Leroy Moore would clearly state that parts of the Collective Significance Report (CSR) were inaccurate. I laid out, in no uncertain terms, four areas of the Report that contained false information. Yet the draft response from Kaiser Hill to Leroy makes no mention of problems with the Collective Significance Report.

I consider the following to be glaring omissions in the Kaiser Hill response:

KH Answer #8 should clearly state that exceedances of action levels WERE NOT ROUTINE. The 5,000 cpm number was a decision point that guided whether soil had background levels of radionuclides or needed to be sampled for radionuclides. The level dictated how the soil was segregated. Everyone involved with the project expected the number to be exceeded from day one. The authors of the CSR misunderstood the purpose of the number.

KH Answer #11 provides the correct information, but fails to mention that the CSR was incorrect on this point.

KH Answer #24 should state that while the measured off-site releases were higher than anticipated, the model used to predict the off-site releases has a very wide error bar, and that the measured value would fall well within that error bar.

KH Answer #29 should state, unambiguously, that a technically defensible method for distinguishing Radon and Thoron from the radionuclides of concern was employed at T3T4, and that all exceedances of the air monitoring action level (10% DAC) were proven to be caused by Radon and Thoron. Yes, we're doing it better now with the AP2, but it wasn't done poorly at T3T4.

Post-It® Fax Note	7671	Date	6-30-97	# of pages	2
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disagrees that
5000 cpm was an
"action level" #2

misreading of
the CSR
(wind speed threshold) #3

#4

out-and-out
wrong #1

